



October 5, 2021

File No. 50031.2179

VIA ECF

Hon. Victor Marrero
United States District Court
Southern District of New York
500 Pearl Street, Suite 1610
New York, NY 10007-1312

Re: *Rosenfield & Company, PLLC v. Trachtenberg, Rodes & Friedberg LLP et al.*
1:21-cv-03858-VM

Dear Judge Marrero:

We are counsel to third-party defendants Barry Friedberg and Leonard Rodes, as well as counsel to defendant Trachtenberg Rodes & Friedberg LLP ("TRF Defendants").

We write on behalf of the TRF Defendants to request a 14-day extension of time, up to and including October 21, 2021, to respond to the third-party complaint and cross claims asserted by defendants Star Auto Sales of Bayside, Inc., Star Auto Sales of Queens, LLC, Star Hyundai LLC, Star Nissan, metro Chrysler Plymouth, Inc., Star Auto Sales of Queens County LLC, and Star Auto Sales of Queens Village LLC ("Star Defendants") (Dkt. No. 58). The TRF Defendants' deadline to respond to the third-party complaint and cross claims is currently October 7, 2021. This request is made with the consent of the Star Defendants.

In accordance with the spirit of Your Honor's Individual Practices, we have contacted counsel for the Star Defendants concerning potential issues prevailing in the claims asserted against the TRF Defendants. Additional time is needed to prepare appropriate correspondence addressing these pleading issues and their legal foundation.

We thank the Court for its attention to this matter.

Request GRANTED.

The TRF Defendants shall have until October 21, 2021 to respond to the Third-Party Complaint.

SO ORDERED.

10/6/2021

DATE

A handwritten signature in black ink, appearing to read 'Victor Marrero', is written over a horizontal line. Below the signature, the text 'VICTOR MARRERO, U.S.D.J.' is printed in a small, all-caps, sans-serif font.

Respectfully,

/s/ Andrew Winters

Andrew W. Winters, Esq. of
LEWIS BRISBOIS BISGAARD & SMITH LLP

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cc: All parties by ECF